

Sealed
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

March 19, 2021

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

vs.

LEE RAY BOYKIN JR.

Defendant.

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§

CRIMINAL NO.

4:21mj0579

MOTION TO SEAL

COMES NOW the United States of America, and files this motion to seal the Complaint sworn to and signed on the 19th day of March 2021, against the above-named defendant and this Motion and Order in support thereof would show the following:

I.

The Complaint charges the defendant with 18 U.S.C. § 242 (Deprivation of Rights Under Color of Law), 18 U.S.C. § 1519 (Destruction, Alteration, or Falsification of Records in Federal Investigations), and 18 U.S.C § 924(c)(1)(A) (Carry and Use of a Firearm in a Crime of Violence). Law enforcement officers will need to locate and plan the arrest of the defendant. Premature disclosure of the existence of the Complaint is likely to result in flight to avoid arrest and prosecution.

II.

The government respectfully requests that the Complaint sworn to and signed on March 19, 2021 against the above-named defendant and this Motion and Order be filed under seal (except copies issued to the defendant, defendant's counsel, counsel for the government and federal agents involved in this investigation), and further requests that the Complaint be unsealed once

the defendant has been arrested.

Date: March 19, 2021

Respectfully submitted,

JENNIFER B. LOWERY
Acting United States Attorney
Southern District of Texas

By: Sebastian A. Edwards
Sebastian Edwards
Assistant United States Attorney
Attorney-in-Charge
S.D. Tex. ID No.: 2936036
State Bar Nos.: 24032149
1000 Louisiana Street, 24th Floor
Houston, Texas 77002
Tel.: (713) 567-9503; FAX: (713) 718-3303
E-mail: Sebastian.Edwards@usdoj.gov
Counsel for the United States of America